

## RESPONSE

Applicant seeks to register the mark VANTAGE as applied to protective cases and covers for cellular phones. While the Examining Attorney acknowledges that there is no conflicting mark, she points to pending Application No. 87/420154 for the mark IEG VANTAGE that is suspended, and which is applied to a laundry list of goods and services. Applicant asserts that there is no likely confusion between its mark VANTAGE as applied to cell phone cases and IEG VANTAGE as applied to any of its goods, including the Class 9 goods.

The mark IEG VANTAGE has the prefix IEG. Applicant's mark does not have that or any prefix. Frequently consumers recall the prefix of a multi-term mark. In that event, a consumer would recall the IEG of IEG VANTAGE, thus allowing a consumer to distinguish between the marks.

Further, at least as applied to Class 9, there are other marks that are or include the designation VANTAGE. See, Reg. No. 2033366 for VANTAGE; Reg. No. 5212427; Reg. No. 5362335; Reg. No. 5302432; Reg. No. 4878114; Reg. No. 4414433; Reg. No. 4625704; Reg. No. 4350864; Reg. No. 3442974; Reg. No. 3845793; Reg. No. 2972030; Reg. No. 2740730; and Reg. No. 1554501. Copies of the registrations are in Exhibit 1. These registrations establish that IEG VANTAGE cannot claim exclusive rights to the suffix VANTAGE as applied to Class 9 goods.

In view of the above, Applicant asserts that there is no likely confusion between its mark VANTAGE as applied to protective cases and covers for cellular phones and the mark IEG VANTAGE.

Applicant asserts that its mark is ready for publication and requests same.